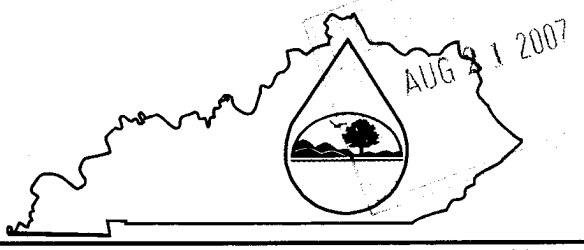
KPDES FORM HQAA



Kentucky Pollutant Discharge Elimination System (KPDES)

High Quality Water Alternative Analysis

The Antidegradation Implementation Procedures outlined in 401 KAR 5:030, Section 1(3)(b)5 allows an applicant who does not accept the effluent limitations required by subparagraphs 2 and 3 of 5:030, Section 1(2)(b) to demonstrate to the satisfaction of the Environmental and Public Protection Cabinet that no technologically or economically feasible alternatives exist and that allowing lower water quality is necessary to accommodate important economic or social development in the area in which the water is located. The approval of a POTW's regional facility plan pursuant to 401 KAR 5:006 shall demonstrate compliance with the alternatives analysis and socioeconomic demonstration for a regional facility. This demonstration shall also include this completed form and copies of any engineering reports, economic feasibility studies, or other supporting documentation

I. Permit Information

Facility Name:	Cedar Crest Subdivision	**KPDES NO.:**	
Address:	Ambassador Drive	**County:**	Grant
City, State, Zip Code:	Dry Ridge, Kentucky 41035	**Receiving Water Name:**	Unnamed tributary of Jack's Lick Creek

II. Alternatives Analysis - For each alternative below, discuss what options were considered and state why these options were not considered feasible.

1. **Discharge to other treatment facilities.** Indicate which treatment works have been considered and provide the reasons why discharge to these works is not feasible.

Dry Ridge, Kentucky is the nearest treatment sewage facility. The end of the sewage lines for the Dry Ridge facility at the Grant County High School on Warsaw Road is approximately 4.5 miles from the site of the Cedar Crest Subdivision. Estimates to extend the sewage lines from Dry Ridge range from $317,550 to $588,720. An engineering firm, Vitech, Inc., was hired to provide an estimate to extend the sewage lines from Grant County High School to the subdivision. The estimated cost of extending the lines was $588,720. Another engineering firm, Mayes, Sudderth and Etheredge, Inc., submitted an estimate of the cost to extend the lines from Grant County High School and install a pump station. Their estimate was $317,550.

2. **Use of other discharge locations.** Indicate what other discharge locations have been evaluated and the reasons why these locations are not feasible.

There are no other discharge locations available for the existing sewage system at Cedar Crest Subdivision. The subdivision is located on 23 residential lots on Ambassador Drive in Grant County, Kentucky. There is a small creek located next to

the subdivision identified as an unnamed tributary of Jack's Lick Creek where the proposed discharge will be placed. There are several other small creeks in the area also identified as unnamed tributaries of Jack's Lick Creek, but not in a realistic proximity to the subdivision. The other neighboring small creeks are at least 2000 feet from the border of the subdivision property. The cost of running pipe to an alternate discharge location (another small creek that is a tributary to Jack's Lick Creek) would be $25.00 to $52.00 per linear foot. A pump station would also be required due to the topography of the area, at a cost of $150.000.00. Accordingly, using an alternate discharge location would cost $200,000.00 to $254,000.00 more than using the proposed discharge location.

The proposed discharge location is located less than 100 feet from the confluence of sanitary sewage piping for the subdivision All of the small creeks in the area discharge into the same larger creek, Jack's Lick Creek. These creeks are also high quality water pursuant to 401 KAR 5:030. Accordingly, there are no other discharge locations which would provide for a lesser ecological impact.

The Bullock Pen Water District is the water district for the area surrounding the subdivision. Per Billy Catlett at the Bullock Pen Water District, there are no drinking water intakes near the proposed discharge location.

II. Alternatives Analysis - continued

3. **Water reuse or recycle.** Provide information about opportunities for water reuse or recycle at this facility. If water reuse or recycle is not a feasible alternative at this facility, please indicate the reasons why.

There are 23 single family residential lots that will use the proposed treatment facility for their sewage treatment. There are no other lots that are planning to use this facility. Assuming that each lot in the subdivision is fully occupied with a single family, three bedroom house which outputs an average 400 gallons-per-day of sewage, the subdivision will produce 9,200 gallons-per-day. The subdivision is located several miles from any other development. There are no golf courses or industrial sites within a five mile radius of the subdivision that would create the availability of reuse or recycle of wastewater from the subdivision. The radius of five miles was used because of the estimates provided for pumping and piping the wastewater to the nearest sewage lines five miles away range from $317,550 to $588,720.

There is no potential for irrigation of landscaping at or near the subdivision. The topography of the subdivision and surrounding land makes any type of irrigation unfeasible. The slopes on the lots of the subdivision are as steep as 24%. This was discovered during the initial development of the lots by the Northern Kentucky Independent District Health Department. Before the lagoon system was considered by the developer, the lots were tested for suitability for individual septic tanks. Due to the type of soil and the steep topography of the lots, the lots were not suitable for septic tanks with leach lines. This would also prevent any type of water reuse or recycle for landscaping in the subdivision. Additionally, there are no "common areas" of the subdivision that require landscaping or irrigation. Instead, it basically consists of one street with 1-acre 23 lots.

Removing the 9,200 gallons of water each day and transporting it to the nearest location to be re-used would cost $450.00 to $500.00 per day. This would need to be transported to the City of Williamstown's treatment facility at a cost of 2 cents per gallon, or $184.00 a day. The annual costs for this transportation and disposal would be $231,410.00 to $249,660.00.

4. **Alternative process or treatment options.** Indicate what process or treatment options have been evaluated and provide the reasons they were not considered feasible.

The following process or treatment options have been evaluated and have been determined to be not feasible due to cost restrictions:

a. Repair of current sewage lagoons.

The residents have also investigated the possibility of having the lagoons that are currently failing repaired. Given the size of the lagoons and the fact that they would need to be emptied, the correction of the problems with the lagoons would be an expensive undertaking. Thelen Associates, Inc. and its engineer, Halis Ider, P.E., solicited bids from three local contractors to repair the lagoons. The bids for the repairs to the lagoons were: $507,383.50 (Taylor Brothers, Inc.), $770,771.60 (Dudley Construction in Ft. Wright, Kentucky) and $861,435.00 (Bray-Arnsperger Excavating, Inc. in Alexandria, Kentucky). Another engineering firm, Mayes, Sudderth and Etheredge, Inc. and its engineer, Walter L. Bowman, P.E., also submitted an estimate of the cost to repair the lagoons. Their estimate was $485,400.00.

b. Recirculating media filter system.

The residents of the subdivision contacted Commonwealth Wastewater Systems, LLC ("CWS") of Louisville, Kentucky and its engineer Alex Rosenberg about the possibility of installing a recirculating media filter system that could be placed on a 33.9 acre lot adjacent to the subdivision. This lot is currently owned by the developer, not the subdivision. However, in order for the system to be installed by CWS, CWS requires that they be permitted to adopt control over the system and run it as a utility under Kentucky law. In order for CWS to do this, they require that all of the sewage lines in the subdivision be replaced. The total cost for the installation of the recirculating media filter system and the sewage lines is $325,000. The cost of installing the recirculating media filter system is prohibitive, and the subdivision does not own the land where the system will be installed. The cost of obtaining the land would be approximately $100,000.00 to $125,000.00.

II. Alternatives Analysis - continued

5. **On-site or subsurface disposal options.** Discuss the potential for on-site or subsurface disposal. If these options are not feasible, then please indicate the reasons why.

The following on-site or subsurface disposal options have been considered and are not feasible:

a. Subsurface discharge on individual lots (leach lines).

The residents have considered installing individual septic leach lines on their properties in order to avoid the use of a treatment plant for the subdivision. All of the lots at the subdivision are at least one acre. However, soil tests for the individual lots were done when the neighborhood was being developed by A & H Development, LLC. Only a few of the lots were found to be acceptable by the Northern Kentucky Independent District Health Department for the installation of septic tanks with individual leach lines. The topography of the lots and the low quality of the soil prevented the installation of septic tanks with individual leach lines. Costs of grading and filling the lots to make all of them suitable, as well as the installation of the individual systems, would be between $40,000 and $60,000 per lot.

b. Spray irrigation system.

A spray irrigation system was discussed with Greg Brown and Vitech, LLC. The lagoons are located on a lot that is a steep hill that is greater than a 24% grade. The topography of the available land on the lot does not allow for consideration of a spray irrigation system. There is simply not enough suitable property available for such a system. Costs for installing a spray irrigation system on other lands, including the costs of the land, piping, pumps and other equipment, would be in excess of $1,000,000.00.

c. Individual home aerobic plants.

The residents have considered installing individual home aerobic treatment plants on their properties. This option was suggested by Greg Brown, P.E. of Vitech Engineering. It was thought that this solution would be less costly then installing a central treatment plant for the subdivision. The discharge from the individual home aerobic plants would have been transported through the existing sewage lines and discharged into the waters of the Commonwealth of Kentucky. Costs for the installation of these systems would exceed $20,000 per lot. However, Mr. Brown was informed by the Division of Water, KPDES Section that "any permitting and installation of individual home aerobic units is not permissible."

6. **Evaluation of any other alternatives to lowering water quality.** Describe any other alternatives that were evaluated and provide the reasons why these alternatives were not feasible.

The other alternatives that were considered would be to continue to use the existing lagoons in their failed condition or install a package treatment plant under the current regulations. The options are discussed below.

a. Continue using the failed lagoon system.

If the lagoons are not repaired or replaced, there will be a continuing discharge of untreated and under-treated sewage into the waters of the Commonwealth. This will continue to negatively impact the surrounding community and increase the risk of disease and infection for the public. The lagoons are located on a hillside above an unnamed tributary of Jack's Lick Creek. Due to failures in the downslope berms of the lagoons, untreated and under-treated sewage escapes out of the lagoons and flows down the hillside into the unnamed tributary of Jack's Lick Creek. The creek flows freely into Jack's Lick Creek. The farms surrounding the subdivision use this creek to water livestock. It is unsafe and unsanitary to continue to allow the discharge of untreated and/or under-treated sewage into this creek on a daily basis.

In addition to the adverse ecological and environmental effects that the current lagoons are causing, there are numerous social and financial hardships caused by the failed state of the lagoons. Of the 23 lots in the subdivision, 17 have homes constructed on them. These 17 homeowners have been unable to sell their homes due to the numerous problems with the septic lagoons. These homeowners have to disclose the problems with the lagoons whenever they have tried to sell their homes, preventing any sales. Four families have declared bankruptcy due to financial problems caused by the current litigation and the inability to sell their homes. This remains a continuing possibility for the remaining homeowners, too. There are several vacant homes in the subdivision that cannot be sold due to the problems with the lagoons. The social and financial impact the failed lagoons have had on the homes has extended beyond the subdivision, as there are now less families in the area to input money into the local economy. Also, the depreciation in the value of these homes is 100% as they cannot be sold due to the problems with the sewage system. These 17 homes would have an average value of $120,000.00 if they had a functioning sewage system.

b. Installation of package treatment plant to meet High Quality Limits of Anti-Degradation.

Greg Brown, P.E. and his company, Vitech LLC, have proposed the installation of a package treatment plant under the new regulations limiting effluent discharge in

Kentucky took effect. Mr. Brown estimates that it will cost at least $250,000 to install a package treatment plant for the subdivision that would comply with the existing regulations. Additionally, he estimates that the annual operating costs for a package treatment plant under the existing regulations would be between $21,900.00 and $39,900.00. For comparison, the cost of operating a package treatment plant under the previous regulations would be less than half those amounts.

III. Socioeconomic Demonstration

1. State the positive and beneficial effects of this facility on the existing environment or a public health problem.

If the current failing sewage lagoons are replaced by a treatment facility, there will be nothing but positive effects on the environment and public health. Currently, there is untreated sewage flowing out of the lagoons and into the surrounding property at a rate of $9,200 gallons per day. There is a stream downhill from the lagoons where this untreated sewage is flowing into an unnamed tributary of Jack's Lick Creek. If the lagoons are replaced, this will completely eliminate any untreated sewage escaping into the environment and harming the public health.

2. Describe this facility's effect on the employment of the area

Currently, there are three homes in the subdivision that are unoccupied and six lots that do not have homes. It is unlikely that these empty homes will become occupied if a working sewage treatment system is not installed in the subdivision. No homes can be built on the empty lots because of the condition of the failed lagoon system. If a treatment facility is installed, additional families will move into the empty homes in the neighborhood and increase the demand for local services and the patronage of local businesses. Also, the empty lots will have homes built on them, allowing for even more families to move into the area. This will have a positive effect on local employment as spending in the local economy will increase. The area that would benefit directly from this facility would be the unincorporated area around Dry Ridge, Kentucky.

The more stable homes that are in the local economy, the more money that is spent in the local economy. According to the 2003 U.S. Census, the median household income in Grant County where the subdivision is located is $41,176. Assuming that just 20% of a households income is spent in the local economy, each household would spend $8,235.20 annually. If the subdivision was completely built up on all 23 lots and each home was occupied, there would be $189,409.60 in spending in the local economy. The current spending by the households in the subdivision in the local economy is significantly less (14 homes x $8,235.20 = $115,292.80, a difference of $74,116.80). This additional spending in the local economy would assist in the economic development of the area and provide for three to six jobs that would not otherwise be available.

3. Describe how this facility will increase or avoid the decrease of area employment.

The treatment facility will allow the employment in the area to increase. It will provide a working sewage treatment system for 23 single family homes. There are currently 17 homes in the subdivision, with at 15 of the homes occupied by families. The current residents of those homes will be able to stay in the neighborhood and not need to relocate outside of the Dry Ridge, Grant County area. 80% of these families work in Grant County and the areas surrounding the surrounding areas of Dry Ridge, Kentucky. They provide labor for the local economy. Also, these families use existing services in the Dry Ridge area and patronize local businesses. At least 75% of their disposable income goes to local area businesses. This increases local employment by increasing spending in the economy.

In addition, the construction of a treatment facility will bring temporary employment to the area. Engineers, plumbers and construction workers will be needed to build the facility for at least one month, at a labor cost of $75,000. This will directly increase employment in the area.

Once the treatment facility is completed, up to two engineers will be needed to monitor and maintain the facility, costing $20,000 to $30,000 annually. This will also directly increase employment in the area.

Currently, there are several homes in the subdivision that are unoccupied and several lots that do not have homes. It is unlikely that these empty homes will become occupied if a working sewage treatment system is not installed in the subdivision. No homes can be built on the empty lots because of the condition of the failed lagoon system. If a treatment facility is installed, additional families will move into the empty homes in the neighborhood and increase the demand for local services and the patronage of local businesses. Also, the empty lots will have homes built on them, allowing for even more families to move into the area. This will have a positive effect on local employment as spending in the local economy will increase. This will also positively affect the local economy as there will be an increase in employment due to the workers needed to construct the new homes.

The current unemployment rate for Grant County, Kentucky is approximately 5.2%. This will decrease with the employment created by the package treatment plant.

4. Describe the industrial or commercial benefits to the community, including the creation of jobs, the raising of additional revenues, the creation of new or additional tax bases.

As additional families move into the subdivision due to the replacement of the failing lagoon system, there will be additional taxes to be collected through real estate taxes, income taxes and sales taxes.

On a $120,000 home in the Cedar Crest Subdivision, which is the average home price in the subdivision according to the Grant County Property Value Administrator's office,

the taxes would be broken down as follows:

State tax - $157.20 (13.1 cents on every $100 of assessed property)

County tax - $172.80 (14.4 cents on every $100 of assessed property)

Health department - $33.60 (2.8 cents on every $100 of assessed property)

Mental health - $15.60 (1.3 cents on every $100 of assessed property)

Soil conservation - $12 (1.0 cents on every $100 of assessed property)

Library - $57.60 (4.8 cents on every $100 of assessed property)

Extension service - $24.84 (2.0 cents on every $100 of assessed property)

Williamstown Independent School taxes - $920.40 (76.7 cents on every $100 of assessed property)

Grant County School taxes - $615.60 (51.3 cents on every $100 of assessed property)

Total: $2,009.64

Although the current homes in Cedar Crest Subdivision are valueless because they cannot be transferred, the owners continue to pay taxes on their home. There is a risk that additional homeowners will declare bankruptcy and/or abandon their homes in the subdivision. For each homeowner that leaves his or her home, the local governments lose $2,009.64 in annual tax revenue. Additionally, if homes were built on the empty lots in the subdivision, there would be an additional $2,009.64 per year of tax revenue. If the subdivision was completely built up on all 23 lots and each home was occupied, there would be a maximum annual tax base of $46,221.72. The current tax base is significantly less (14 homes x $2,009.64 = $28,134.96, a difference of $18,086.76).

Additionally, the more stable homes that are in the local economy, the more money that is spent in the local economy. The median household income in Grant County where the subdivision is located is $41,176, according to the 2003 U.S. Census. Assuming that just 20% of a households income is spent in the local economy, each household would spend $8,235.20 annually. If the subdivision was completely built up on all 23 lots and each home was occupied, there would be $189,409.60 in spending in the local economy. The current spending by the households in the subdivision in the local economy is significantly less (14 homes x $8,235.20 = $115,292.80, a difference of $74,116.80). This additional spending in the local economy would assist in the economic development of the area and provide for a number of jobs that would not otherwise be available.

5. Describe any other economic or social benefits to the community.

Once the failing lagoon systems are replaced, the subdivision will become a stable community. There will not be empty houses in the subdivision where people have had to abandon their homes. With a stable community, there will an increase in area property values. Currently, the homes in the area are valueless, as they cannot be sold. According to the Grant County Property Value Administrator's office, the average home value in Cedar Crest Subdivision is $120,000. Accordingly, once the current lagoon system is replaced, there will be 17 additional homes that are worth an average of $120,000 available in the local community. This will immediately add an economic value of approximately $2,000,000 to the local community. The six unsold lots in the subdivision will also be suitable for the construction of new homes, adding a minimum of $720,000 in housing stock to the local community. Also, once the facility is installed, the value of each of the homes will increase between $20,000 to $40,000.

III. Socioeconomic Demonstration - continued

	Yes	No
6. Will this project be likely to change median household income in the county?	X	☐
7. Will this project likely change the market value of taxable property in the county?	X	☐
8. Will this project increase or decrease revenues in the county?	X	☐
9. Will any public buildings be affected by this system?	☐	X

10. How many households will be *economically* or *socially* impacted by this project?

At least 23, as well as additional households in the local area due to: increased economic activity, temporary employment for the construction of the facility and the employment of an engineer for the facility.

11. How will those households be *economically* or *socially* impacted? (For example, through creation of jobs, educational opportunities, or other social or economic benefits.)

The 23 households and lots in the subdivision will be positively economically impacted because their homes will increase in value with a working septic system. The 17 homes will go from being valueless to having a value of at least $120,000. The residents of the subdivision will also be positively socially impacted as they will no longer be living next to a public nuisance – a failing sewage lagoon system that is placing 9,200 gallons of untreated sewage into the environment every day.

Also, there will be additional economic impact for the new employment created by the construction and maintenance of the package treatment plant, as well as the construction of new homes in the subdivision.

	Yes	No
12. Does this project replace any other methods of sewage treatment to existing facilities? (If so describe how)	X	☐

This project would replace the failing sewage lagoons where the subdivision's wastewater is currently being collected and discharged into the environment. Cedar Crest Subdivision consists of 23 lots, 17 of which have homes on them. The developer chose to install a lagoon based on-site sewage disposal system. The lagoon system consisted of individual septic tanks for the lots with sewage lines running through the subdivision to two large evapo-transpiration lagoons. The lagoons for the sewage

system as built were placed on a hillside below the subdivision. The lagoons were improperly constructed and/or designed, and began to fail shortly after they were built. Several repairs were made to the lagoons before the residents of the subdivision purchased their lots and moved in to the subdivision. The lagoons continued to have problems and eventually failed. The downslope edge of the lagoons has given way, allowing the untreated sewage in the lagoons to escape and flow into a creek at the bottom of the hillside. There is currently a discharge of 9,200 gallons per day.

	Yes	No
13. Does this project treat any existing sources of pollution more effectively? (If so describe how.)	X	☐

Currently, the wastewater lagoons are not able to treat the 9,200 gallons per day of sewage that is being piped into the lagoons, as it is escaping and entering into the environment. This project would completely and properly treat the untreated sewage that is currently escaping from the lagoons into the surrounding property. This project will also allow the subdivision to comply with its existing permit limits.

III. Socioeconomic Demonstration - continued

	Yes	No
14. Does this project eliminate any other sources of discharge or pollutants? (If so describe how.)	X	☐

Currently, the wastewater lagoons are not able to treat the 9,200 gallons per day of sewage that is being piped into the lagoons, as it is escaping and entering into the environment. This project will completely eliminate the discharge of untreated sewage into surrounding properties from the failing sewage lagoon system.

Also, once the package treatment plant is complete and operational, the existing lagoons will be removed and there will no longer be the potential for wastewater leaking from the lagoons.

15. How will the increase in production levels positively affect the socioeconomic condition of the area?

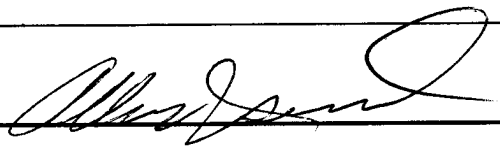
There will be increase in the number of homes when the package treatment plant is installed. The empty lots in the subdivision will be suitable for construction of new homes. This will increase the property values in the county and increase the local tax base. The average price of a new home in the subdivision would be $120,000.

16. How will the increase in operational efficiency positively affect the socioeconomic condition of the area?

The current lagoon systems are inefficient as they fail to treat the 9,200 gallons of wastewater that is piped into them each day. The installation of a wastewater treatment facility will ensure the proper treatment of these 9,200 gallons of sewage. This will positively affect the socioeconomic condition of the area by eliminating the discharge of untreated sewage and abate a nuisance. Also, more efficient treatment of pollutants to the creek below the subdivision means cleaner, more sanitary conditions for persons and property near the creek.

Installation of a package treatment plant would also allow for more efficient expansion of sewage treatment facilities in the area at a later date, if needed.

IV. Certification: I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Name and Title:	**Allen Iseral, Vice President**	**Telephone No.:**	(859)428-3366
Signature:		**Date:**	8/11/07

Kentucky Pollutant Discharge Elimination System (KPDES)
Instructions
KPDES Permit Application Supplemental Information

SECTION I – PERMITTEE INFORMATION

Facility Name:	Provide the name of the facility
Mailing Address, City, State, and Zip Code:	Provide the mailing address
KPDES No.:	Provide the KPDES permit number for the facility
County:	Indicate the county in which the facility is located
Receiving Water Name:	Indicate the water body into which the facility discharges or plans to discharge.

SECTION II – Alternatives Analysis

For each item, provide a synopsis of the evaluations that were performed. A successful demonstration will provide justifications as to why these alternatives were not consider viable.

Include appropriate supporting documentation.

SECTION III – Socioeconomic Demonstration

Answer yes or no as appropriate. Where indicated, provide a synopsis of the positive economic impacts that will result from this project. A successful demonstration will show why the lowering of water quality is necessary to accommodate important economic or social development in the area.

Include appropriate supporting documentation.

SECTION IV - CERTIFICATION

Name and Title:	Indicate the name and title of the person signing the form.
Telephone No.:	Provide the telephone number of the person signing the form.
Date:	Indicate the date that the form was signed.

This form is part of the permit application and must be signed as follows:

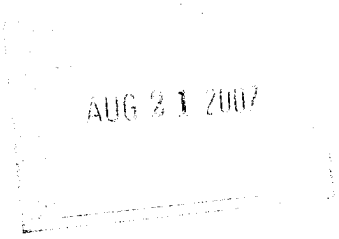
Corporation: by a principal executive officer of at least the level of vice president
Partnership or sole proprietorship: by a general partner or the proprietor respectively

JEFFREY C. SHIPP
jshipp@kplaw.com

Kohnen+Patton LLP
Attorneys at Law

August 20, 2007

Federal Express



Courtney Seitz
Kentucky Division of Water
KPDES Section
14 Reilly Road
Frankfort, KY 40601

Re: Brown, et al. v. Cedar Crest Subdivision Homeowner's Association, Inc., et al. v. Thoroughbred Engineering, Inc.
K & P File No. CE005-LI001

Dear Mr. Seitz:

Enclosed please find the most recently revised High Quality Water Alternative Analysis Application ("HQAA") for Cedar Crest Subdivision. Please review this at your earliest opportunity. We are hoping to move forward with the package treatment plant solution as quickly as possible. This will eliminate the current untreated discharge by the lagoons.

Should you have any questions, please do not hesitate to contact me or Louis C. Schneider with my office.

Sincerely,

KOHNEN & PATTON LLP

Jeffrey C. Shipp/bsp
Jeffrey C. Shipp

JCS/bsp
Enclosures
cc: Mike Foley, Esq. (w/o enclosure)
Louis C. Schneider, Esq.

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All are admitted in Ohio
1 Also admitted in Florida
2 Also admitted in Indiana
3 Also admitted in Kentucky
4 Also admitted in Minnesota